

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,  
v  
Case No.: 2:25-mc-50623  
Hon. Susan K. DeClercq

WILLIAM A. SMITH,

Defendant,  
and

PAYCHEX, INC.,

Garnishee.

/

**APPLICATION FOR WRIT OF CONTINUING GARNISHMENT**

The United States of America, Plaintiff, makes application in accordance with 18 U.S.C. § 3613(a) and 28 U.S.C. §§ 3002, 3202, and 3205 of the Federal Debt Collection Procedures Act (FDCPA) to the Clerk of the United States District Court to issue a Writ of Garnishment upon the judgment entered against the Defendant, William A. Smith, Social Security No. \*\*\*-\*\*-9163, whose last known address is: REDACTED, Detroit, MI 48235, in Case No.: 2:24CR20532 01 in the amount of \$48,012,358.45. The sum of \$0.00 has been credited to the judgment debt, leaving a total balance due of \$48,012,358.45 as of May 29, 2025. Demand for payment of the above-stated debt was made upon the debtor not less than 30 days from May 29, 2025, and debtor has failed to satisfy the debt.

The Garnishee is believed to owe or will owe money or property to the judgment debtor, or is in possession of property of the debtor, and said property is a nonexempt interest of the debtor.

The name and address of the Garnishee or his authorized agent is:

PAYCHEX, INC.  
c/o The Corporation Company  
40600 Ann Arbor Rd. E., Ste. 201  
Plymouth, MI 48170

After the Garnishee has been served, pursuant to 28 U.S.C. § 3202(c), the United States will serve the debtor and each person whom the United States has reasonable cause to believe has an interest in the property subject to the Writ of Garnishment. The United States will serve the debtor by regular mail at the last known address, as criminal defendants are required to notify the Attorney General and the Court of any change in mailing address or residence and to provide notification of any change in economic circumstances until any fine or restitution has been paid in full. *See* 18 U.S.C. §§ 3612(b)(1)(F), 3572(d)(3), and 3664(k).

Respectfully submitted,

JEROME F. GORGON JR.  
United States Attorney

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Date: May 29, 2025